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VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Re: Kong v. Getty, et al.

USDC Central District of California Case No. 2:18-CV-09321-MWF-JDE

Dear Ms. Menshikova:

On May 20, 2019, I propounded Request for Admissions, Requests for Production of Documents, and Interrogatories on Defendants Brenda Sue Getty and Richard Getty. Their responses were due on June 24, 2019. As of the date of this letter, no responses for Set One Request for Admissions, Requests for Production of Documents, and Interrogatories have been received. Also no request for an extension of time to respond has been received or granted. Thus, please consider this letter as an attempt to meet and confer pursuant to FRCP § 37(a)(1) and Local Rules.

Due to Defendants' failure to respond or seek an extension, their objections to the Requests for Production of Documents and Interrogatories have been waived. Also, the Requests for Admissions will be deemed admitted. Please forward your complete, verified, and un-objected responses to Requests for Production of Documents and Interrogatories within **ten days** of the date of this letter so that we may avoid the necessity of a motion to compel and sanctions.

If you believe you have received this letter in error, or if you wish to meet and confer regarding this issue, **please contact me within 10 days of the date of this letter** with your preferred date and time and I will happily arrange a telephonic pre-filing conference of counsel. However, if I receive no response—either to discovery or my invitation to further meet and confer—I will file a motion to compel.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Thank you,

A handwritten signature in blue ink that reads "B. A. Smith". The signature is written in a cursive, flowing style.

Bradley Smith